

I am writing to oppose the reasoning behind NPRM 02-33, "Appropriate Framework for Broadband Access to the Internet over Wireline Facilities", because I am afraid that treating broadband Internet access as an information service (as proposed by NPRM 02-33) would deprive United States citizens of the single most important feature of the Internet that has made it such a runaway success over the last decade.

Architecture separates "access" from "information". Any one of the various forms of access to the Internet puts one in touch with an infinite array of information.

Access is a fundamentally different business from an "information service". To equate "broadband access" and "information service" -- as NPRM 02-33 proposes -- would be a horrendous step backwards.

I am writing as a concerned citizen of the United States, and I am writing with hope that recent great advances in communications technology -- and, more importantly, in network architecture -- will become available to all.

"Access" involves connecting my computer (and other digital communications devices) to the Internet. "access" -- happens over a wire, over a cable, over an optical fiber, or through the air (either as radio-frequency energy, or as light-wave energy).

"Information" is information is in the ones and zeros that enter my computer to be processed by it. Information 1's and 0's can flow into my devices over a variety of ways.

To equate "access" with "information", as does NPRM 02-33, is simply incorrect.

Telephone networks were developed to deliver one kind of information -- the human voice. It was engineered for voice, and it gave access to voice.

Everything else that it carried (e.g., touch tones, modem signals, signalling information to set up telephone calls) was either an exception, or an adjunct to voice telephony.

The wire that came into the house could not be distinguished from the service it provided. It was the same for television and radio.

Each had its own dedicated infrastructure (be it a wire or a frequency band) to carry a specific type of information.